

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CoxCom, Inc. dba Cox Communications,) Case No.: 1:05-cv-30107 KPN
New England)
("Cox"))
)
 Plaintiff,) MOTION FOR EXTENSION OF TIME
) FOR FACT DISCOVERY
 vs.)
)
 Bill Langlois)
)
 Defendant

NOW COMES the Plaintiff in the above-captioned case and respectfully requests that this Court extend the deadline for fact discovery to March 24, 2006.

As grounds, the Plaintiff states:

1. Plaintiff sent discovery to Defendant in October of 2005.
2. The Plaintiff did not receive discovery until the beginning of January 2006.
3. The delay in the discovery response was approximately one month.
4. Due to the delay, the Plaintiff needs more time to assess the discovery response and to possibly do actions in follow up to the discovery response.
5. The Defendant has assented to this extra time and in consideration, should this Motion be granted, the Plaintiff would not act upon the fact that the Requests for Admissions could be deemed to have been admitted because the response was long after they were due.

Certification pursuant to LR D. Mass 7.1 (A) (2)

Plaintiff's counsel certifies that he has conferred with Defendant and that the Defendant fully assents to this motion.

In further support of this motion, see affidavit of John M. McLaughlin

Respectfully Submitted for the Plaintiff,
By Its Attorney

2/16/2006

Date

/s/ John M. McLaughlin

John M. McLaughlin (BBO: 556328)

Green, Miles, Lipton & Fitz-Gibbon LLP

77 Pleasant Street

P.O. Box 210

Northampton, MA 01061-0210

(413) 586-0865

CERTIFICATE OF SERVICE

I, John M. McLaughlin, attorney for the Plaintiff, hereby certify that on the 16th day of February 2006, a copy of the foregoing motion and affidavit were sent via first class mail to

Bill Langlois
158 Sturbridge Road
Holland, MA 01521

/s/ John M. McLaughlin
John M. McLaughlin